

systemic or “willful.”

The limits set forth in the Federal Rules shall govern Phase I discovery absent agreement by the Parties or leave of the Court. Unless otherwise stipulated or ordered by the Court, each deposition, including expert depositions, shall be limited to 1 day of 7 hours.

The parties shall serve initial expert witness disclosures for Phase I, pursuant to Fed. R. Civ. P. 26(a)(2)(B), by **March 1, 2013**. The parties shall serve rebuttal expert disclosures by **April 1, 2013**. The parties shall complete all Phase I expert depositions by **April 30, 2013**.

All Phase I fact discovery shall be completed by **April 30, 2013**.

All Phase I dispositive motions shall be filed by **May 8, 2013**. Opposition briefs shall be filed within 21 days thereafter. Reply briefs shall be filed within ten days thereafter.

This Court will subsequently conduct hearings on the dispositive motions, if necessary.

If Plaintiffs’ claims survive this Court’s decisions on the dispositive motions, the parties will hold a subsequent discovery conference for Phase II no later than fourteen days after the Court’s rulings are issued. Promptly thereafter, the parties will submit to the Court their proposed discovery plan for Phase II, which will include all issues regarding class certification and whether or not the alleged FCRA violations were “willful”.

The parties have discussed all other items required by Rule 26(f).

Entered this ____ day of January, 2013

Hon. John A. Gibney, Jr.
United States District Judge

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